

# MEMO ENDORSED

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April 2, 2024

**BY ECF**

The Honorable Valerie E. Caproni (VEC)  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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Re: *United States v. Gerald Lee*, 23 Cr. 141 (VEC)

Dear Judge Caproni:

I represent defendant Gerald Lee in the above-referenced matter. Mr. Lee and all parties are scheduled to file our Motions in Limine this Friday, April 5, 2024.

I respectfully submit this letter to request an extension of the Motion In Limine deadline. I am currently engaged in trial before Judge Cogan in E.D.N.Y on a 4-6 week Federal Racketeering murder and drug trial which started last week. I have been actively negotiating with the Government regarding a disposition of this matter. The Government does not object to this application. In light of the above, I would ask that the Motion schedule be extended.

The Court's consideration is greatly appreciated.

Respectfully submitted,

By:/s/Kenneth J. Montgomery

Kenneth J. Montgomery, Esq.  
Attorney for Gerald Lee

cc: All Counsel of Record (via ECF)

The deadline for motions *in limine* as to Mr. Lee only is extended to **April 12, 2024**. Responses are due **April 19, 2024**. By **5:00 PM on April 3, 2024**, the Government must submit a letter stating whether the extension request was on consent as to all Defendants, or to Mr. Lee only.

SO ORDERED.

  
04/03/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE